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TSE DECLARATION ISO OF PLAINTIFFS' ADMINISTRATIVE MOTION TO SEAL

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I, Jonathan Tse, declare as follows:

- I am a member of the bar of the State of California and an attorney at Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. I am making this declaration pursuant to Civil Local Rule 79-5(e)-(f) as an attorney for Google as the Designating Party, pursuant to Civil Local Rule 79-5(f)(3) in response to Dkt. 671.
- 3. On August 8, 2022, Plaintiffs filed an Administrative Motion to file under seal portions of their Motion for Relief regarding Google's Production of Documents Improperly Withheld as Privileged ("Plaintiffs' Motion"). On August 10, 2022, the Court granted the Parties' Joint Stipulation and Proposed Order extending time for Google to submit its declaration in support of Plaintiffs' Motion to Seal to August 29, 2022 (Dkt. 679).
- 4. I have reviewed the documents that Plaintiffs seek to file under seal pursuant to Civil Local Rule 79-5, unreducted versions of which have been filed at Docket Entry 671. Based on my review, there is good cause to seal the following information:

		· ·
	Plaintiffs' Administrative Motion for	The information requested to be sealed contains
	Relief re: Google's Production of	Google's highly confidential and proprietary information
$\parallel$	Documents Improperly Withheld as	regarding highly sensitive features of Google's internal
	Privileged at:	systems and operations, including Google's internal
	Pages: 1:8-10, 4:7-8	projects, identifiers, and their proprietary functionalities,
	1 ages. 1.6-10, 4.7-6	that Google maintains as confidential in the ordinary
		course of its business and is not generally known to the
		public or Google's competitors. Such confidential and
		proprietary information reveals Google's internal
		strategies, system designs, and business practices for
		operating and maintaining many of its important

**Document** 

proprietary information res of Google's internal ding Google's internal oprietary functionalities, dential in the ordinary generally known to the Such confidential and als Google's internal business practices for any of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise

**Basis for Sealing** 

1		Google's internal practices relating to competing products.
2	Exhibit A - Documents Google	The information requested to be sealed contains
3	Produced Pursuant to this Court's June 10, 2022 Order (Dkt. 605) at:	Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal
4	, ,	systems and operations, including Google's internal
5	Pages: 2:18-20, 5:14-16	projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary
6		course of its business and is not generally known to the public or Google's competitors. Such confidential and
7		proprietary information reveals Google's internal strategies, system designs, and business practices for
8		operating and maintaining many of its important
9		services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
10		information could affect Google's competitive standing
11		as competitors may alter their systems and practices relating to competing products. It may also place Google
12		at an increased risk of cybersecurity threats, as third
13		parties may seek to use the information to compromise Google's internal practices relating to competing
14	E 1 1 2 C C 1 0 2021 I	products.
15	Exhibit C - September 8, 2021 Letter re: Privilege Log at:	The information requested to be sealed contains Google's highly confidential and proprietary information
16	Page 6	regarding highly sensitive features of Google's internal systems and operations, including Google's internal
17		projects, identifiers, and their proprietary functionalities,
18		that Google maintains as confidential in the ordinary course of its business and is not generally known to the
19		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
20		strategies, system designs, and business practices for operating and maintaining many of its important
21		services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-
22		3. Public disclosure of such confidential and proprietary
23		information could affect Google's competitive standing as competitors may alter their systems and practices
24		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
25		parties may seek to use the information to compromise
26		Google's internal practices relating to competing products.
27	Exhibit 2 - GOOG-BRWN-00855317	The information requested to be sealed contains Google's highly confidential and proprietary information
27	Entirely	regarding highly sensitive features of Google's internal
20	L	systems and operations, including Google's internal

1 2 3		projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and
4		proprietary information reveals Google's internal strategies, system designs, and business practices for
5		operating and maintaining many of its important services, and falls within the protected scope of the
6		Protective Order entered in this action. See Dkt. 81 at 2-
7		3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing
8		as competitors may alter their systems and practices relating to competing products. It may also place Google
9		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
10		Google's internal practices relating to competing
10		products.
11	Exhibit 3 - GOOG-CABR-05949445	The information requested to be sealed contains Google's highly confidential and proprietary information
12	Entirely	regarding highly sensitive features of Google's internal
13		systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities,
14		that Google maintains as confidential in the ordinary course of its business and is not generally known to the
15		public or Google's competitors. Such confidential and
16		proprietary information reveals Google's internal strategies, system designs, and business practices for
17		operating and maintaining many of its important services, and falls within the protected scope of the
18		Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
19		information could affect Google's competitive standing
20		as competitors may alter their systems and practices relating to competing products. It may also place Google
21		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
22		Google's internal practices relating to competing
23	Exhibit 4 - GOOG-BRWN-00856066	products.  The information requested to be sealed contains
24	Entirely	Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal
25		systems and operations, including Google's internal
26		projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary
		course of its business and is not generally known to the
27		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
28		strategies, system designs, and business practices for

operating and maintaining many of its important 1 services, and falls within the protected scope of the 2 Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary 3 information could affect Google's competitive standing as competitors may alter their systems and practices 4 relating to competing products. It may also place Google 5 at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise 6 Google's internal practices relating to competing products. 7 The information requested to be sealed contains Exhibit 5 - GOOG-BRWN-00856578 Google's highly confidential and proprietary information 8 Entirely regarding highly sensitive features of Google's internal 9 systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities, 10 that Google maintains as confidential in the ordinary course of its business and is not generally known to the 11 public or Google's competitors. Such confidential and proprietary information reveals Google's internal 12 strategies, system designs, and business practices for 13 operating and maintaining many of its important services, and falls within the protected scope of the 14 Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary 15 information could affect Google's competitive standing 16 as competitors may alter their systems and practices relating to competing products. It may also place Google 17 at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise 18 Google's internal practices relating to competing products. 19 Exhibit 6 - GOOG-BRWN-00857642 The information requested to be sealed contains 20 Google's highly confidential and proprietary information Entirely regarding highly sensitive features of Google's internal 21 systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities, 22 that Google maintains as confidential in the ordinary course of its business and is not generally known to the 23 public or Google's competitors. Such confidential and 24 proprietary information reveals Google's internal strategies, system designs, and business practices for 25 operating and maintaining many of its important services, and falls within the protected scope of the 26 Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary 27 information could affect Google's competitive standing 28 as competitors may alter their systems and practices

1		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
2		parties may seek to use the information to compromise
3		Google's internal practices relating to competing products.
4	Exhibit 10 - GOOG-BRWN- 00848723 at:	The information requested to be sealed contains Google's highly confidential and proprietary information
5	Pages: -725-727	regarding highly sensitive features of Google's internal
6	1 uges. 723 727	systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities,
7		that Google maintains as confidential in the ordinary course of its business and is not generally known to the
8		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
9		strategies, system designs, and business practices for operating and maintaining many of its important
10		services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-
11		3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing
12		as competitors may alter their systems and practices
14		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
15		parties may seek to use the information to compromise Google's internal practices relating to competing
	E 171 12 GOOG GAPP	products.
16	Exhibit 12 - GOOG-CABR- 05888096	The information requested to be sealed contains Google's highly confidential and proprietary information
17	Entirely	regarding highly sensitive features of Google's internal systems and operations, including Google's internal
18		projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary
19		course of its business and is not generally known to the
20		public or Google's competitors. Such confidential and proprietary information reveals Google's internal
21		strategies, system designs, and business practices for operating and maintaining many of its important
22		services, and falls within the protected scope of the
23		Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary
24		information could affect Google's competitive standing as competitors may alter their systems and practices
25		relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third
26		parties may seek to use the information to compromise
27		Google's internal practices relating to competing products.
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1	Exhibit 13 - GOOG-BRWN-	The information requested to be sealed contains
	00853326 at:	Google's highly confidential and proprietary information
2	Pages: -326, -329-331	regarding highly sensitive features of Google's internal
3		systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities,
4		that Google maintains as confidential in the ordinary course of its business and is not generally known to the
5		public or Google's competitors. Such confidential and
6		proprietary information reveals Google's internal strategies, system designs, and business practices for
7		operating and maintaining many of its important services, and falls within the protected scope of the
8		Protective Order entered in this action. See Dkt. 81 at 2-
9		3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing
10		as competitors may alter their systems and practices
		relating to competing products. It may also place Google
11		at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise
12		Google's internal practices relating to competing
13	Exhibit 15 - GOOG-BRWN-	products.  The information requested to be sealed contains
14	00850441	Google's highly confidential and proprietary information
	Entirely	regarding highly sensitive features of Google's internal
15		systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities,
16		that Google maintains as confidential in the ordinary
17		course of its business and is not generally known to the public or Google's competitors. Such confidential and
18		proprietary information reveals Google's internal strategies, system designs, and business practices for
19		operating and maintaining many of its important
20		services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-
21		3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing
22		as competitors may alter their systems and practices relating to competing products. It may also place Google
23		at an increased risk of cybersecurity threats, as third
24		parties may seek to use the information to compromise Google's internal practices relating to competing
25	Entitie 16 Francis D. 4 CD. C	products.
	Exhibit 16 - Expert Report of Prof. On Amir at:	The information requested to be sealed contains Google's highly confidential and proprietary information
26	Pages 2-4	regarding highly sensitive features of Google's internal
27	1 agus 2-7	systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities,
28		that Google maintains as confidential in the ordinary

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10	Exhibit 17 - Expert Report of Bruce Strombom at:
11	Pages: i-ii, 21
11 12	Pages: i-ii, 21
	Pages: i-ii, 21
12	Pages: i-ii, 21
12 13	Pages: i-ii, 21
12 13 14	Pages: i-ii, 21
12 13 14 15	Pages: i-ii, 21
12 13 14 15 16	Pages: i-ii, 21
12 13 14 15 16 17	Pages: i-ii, 21
12 13 14 15 16 17 18	Pages: i-ii, 21

course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.

Google's request is narrowly tailored in order to protect its confidential information. These redactions are limited in scope and volume. Because the proposed redactions are narrowly tailored and limited to portions containing Google's highly-confidential or confidential information, Google requests that the portions of the aforementioned documents be redacted from any public version of those documents.

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1	I declare under penalty of perjury of the laws of the United States that the foregoing is true	e
2	and correct. Executed in San Francisco, California on August 29, 2022.	
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4	DATED: August 29, 2022 QUINN EMANUEL URQUHART &	
5	SULLIVAN, LLP	
6		
7	By /s/ Jonathan Tse	_
8	Jonathan Tse	
9	Attorney for Defendant	
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